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VIA ECF

Hon. Peggy Kuo
United States Magistrate Judge
United States District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

**Re: *Miller, et al. v. Arab Bank, PLC*, No. 18-cv-2192 (RPK) (PK)
Pam, et al. v. Arab Bank, PLC, No. 18-cv-4670 (RPK) (PK)**

Dear Magistrate Judge Kuo:

We submit this joint letter in the above-referenced actions in response to the Court's June 4, 2021, Order directing the parties to "file a further joint status report by August 9, 2021 reporting on the progress of discovery and raising any issues which need to be addressed." The parties conferred on August 2, 2021 and offer the following update.

A. The Status of the Miller and Pam Plaintiffs' Document Productions

As Plaintiffs previously advised the Court, Plaintiffs are continuing to identify and/or produce documents on a rolling basis that are responsive to Arab Bank's discovery requests and are working with vendors in the U.S. and Israel to obtain electronically stored information ("ESI") responsive to Arab Bank's discovery requests.

B. The Status of Defendant's Document Production

Defendant has completed its document production responsive to Plaintiffs' First and Second Document Requests other than those documents subject to the bank privacy laws of the Kingdom of Jordan ("Jordan"), the Palestinian National Authority ("PNA"), and the Republic of Lebanon ("Lebanon"). As previously reported, the parties are awaiting decisions from the Palestinian and Jordanian Authorities on the Letters Rogatory. The parties agree that if substantive responses are not received from the government authorities by September 15, Defendant will draft a written inquiry to be sent by the Defendant or the Court to the non-responsive governmental authority(ies) by September 15, and Plaintiffs have agreed to review and approve the contents of the written inquiry prior to its submission.

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The parties have further agreed that if the non-responsive government authority(ies) still do not reply within 30 days after the written inquiry is submitted, the parties will confer by November 1 and then contact the Court to discuss next steps.

C. The Parties' Proposal for Addressing Outstanding Discovery Issues

The parties further agree to advise the Court should either party require the Court's intervention to resolve any dispute regarding the outstanding discovery or to report on any significant developments warranting the Court's immediate attention.

The parties believe that the schedule proposed herein is reasonable in light of developments abroad and request that the Court adopt it. Should the Court wish any further information regarding the parties' proposal or additional information regarding the discovery completed to date, the parties will of course respond or otherwise make themselves available at the Court's convenience.

Respectfully submitted,

/s/ Brett Ingerman

cc: All Counsel